

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JEFFRY SIMPSON,

Plaintiff,

v.

HELBING LAW GROUP,

Defendant,

Civil Action No: 4:22-cv-231

State Court Case No.: 03-Sc-22-00042

**DEFENDANT HELBING LAW GROUP'S
NOTICE OF REMOVAL**

Defendant Helbing Law Group. (“Defendant”) files this *Notice of Removal* of this action from the Justice of the Peace Court, Precinct 3, Collin County, Texas to the United States District Court for the Eastern District of Texas, Sherman Division as follows:

1. Plaintiff Jeffry Simpson (“Plaintiff”) filed his Complaint on January 24, 2022, in the Justice Court, Precinct 3, Collin County, Texas.

2. This is a civil action based on Plaintiff’s contentions that Defendant has violated the Telephone Consumer Protection Act (TCPA), 47 U.S. Code § 227, *et seq.* (“TCPA”).

3. Removal is proper because this case involves a federal question – alleged violations of the TCPA. Therefore, the suit is removable under 28 U.S.C. § 1441(a).

4. Removal is timely pursuant to 28 U.S.C. § 1446(b) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff’s Complaint. Plaintiff served a copy of the Complaint upon Defendant on March 7, 2022.

5. Venue is proper in this district under 28 U.S.C. § 1441(a) because the state court where the suit has been pending is located in this district.

6. Pursuant to 28 U.S.C. § 1446(a) and LR 81, copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant, index of matters being filed and a list of all counsel of record, including addresses, telephone numbers and parties represented, are attached hereto and incorporated herein by reference.

7. Notice of this removal will be promptly filed with the Justice Court, Precinct 3, Collin County, Texas and be served on all adverse parties.

8. Plaintiff did not request a jury trial in state court.

For the above reasons, Defendant Helbing Law Group requests that this Court assume full jurisdiction over the proceeding as provided by law.

Dated: March 23, 2022

Respectfully submitted,

JAFFER & ASSOCIATES, PLLC

By: /s/ Robert Leach

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 23, 2022, a true copy of this Motion has been filed on CM/ECF and will be served on all parties in a manner approved by the Texas Rules of Civil Procedure.

/s/ Robert Leach

Robert Leach